

Stark County Regional Planning Commission Stark County Area Transportation Study

201 3rd Street NE, Suite 201, Canton, Ohio 44702-1211

Phone: 330-451-7389 Fax: 330-451-7990 Website: www.spc.co.stark.oh.us

January 22, 2014

Environmental Management Support, Inc. Attn: Mr. Don West 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910 Phone (301) 589-5318

Re: Stark County, Ohio, Proposal for United States Environmental Protection Agency Community-Wide Coalition Brownfields Assessment Grant for Petroleum and Hazardous Substances Contaminated Sites

Dear Mr. West.

The Stark County Regional Planning Commission is pleased to submit the attached project proposal for consideration in the competitive pursuit of United States Environmental Protection Agency Community-Wide Coalition Brownfields Assessment Grant funds for Petroleum and Hazardous Substances. The following information is provided per the FY 14 Guidelines for Brownfields Assessment Grants:

A) Applicant Identification: Stark County Regional Planning Commission (SCRPC), 201 3rd Street NE, Suite 201, Canton, Ohio 44702-1211. Coalition partners include the City of Canton (218 Cleveland Avenue SW, Canton, Ohio 44702) and the City of Alliance (504 East Main Street, Alliance, Ohio 44601).

B) Applicant DUNS number: 0793635650000

C) Funding Requested:

- a. Grant Type: Assessment Grant
- b. Amount: \$600,000. Total
- c. Contamination: Petroleum (\$200,000) and Hazardous Substances (\$400,000)
- d. Coalition Community-wide

D) Location: Stark County, Ohio and its 36 local governments; Alliance, Canal Fulton, Canton, Louisville, Massillon, North Canton, Beach City, Brewster, East Canton, East Sparta, Hartville, Hills and Dales, Limaville, Magnolia, Minerva, Meyers Lake, Navarre, Waynesburg, Wilmot, Bethlehem Township, Canton Township, Jackson Township, Lake Township, Lawrence Township, Lexington Township, Marlboro Township, Nimishillen Township, Osnaburg Township, Paris Township, Perry Township, Pike Township, Plain Township, Sandy Township, Sugarcreek Township, Tuscarawas Township, and Washington Township

E) Property Name/Location: County-wide: Stark County

F) Contacts:

- i) Project Director: Ms. Brenda Sarsany, Chief of Planning, SCRPC, 2013rd Street NE, Canton, OH 44702-1211 bksarsany1@starkcountyohio.gov P: (330) 451-7446, F: (330) 451-7990
- ii) Chief Executive: Mr. Robert Nau, AICP, Executive Director, SCRPC 201 3rd Street NE, Canton, OH 44702-1211 ranau@starkcountvohio.gov P: (330) 451-7488, F: (330) 451-7990
- G) Date Submitted: January 22, 2014
- H) Project Period: The project period will not exceed three (3) years. Dependent on the award date, the approximate project period will be from July 1, 2014 through June 31, 2017.
- I) Population: SCRPC region: 375,586; City of Canton: 73,007, City of Alliance: 22,322 (U.S. Census Bureau, Census 2010)
- J) Special Considerations: See Appendix E. Our proposed project is primarily focusing on Phase II assessments. As demonstrated in Section V.B.2.b, over 60% of the requested dollar amount for petroleum and hazardous substance assessment has been allocated to the Phase II Assessment of brownfields sites in Stark County. In addition, SCRPC is a core partner in a HUD-DOT-EPA Partnership for Sustainable Communities grant, as described in Section V.B.2.c.

Thank you for your review of the attached proposal. Please do not hesitate to contact this office at (330) 451-7488 should you have any questions.

Sincerely.

Brenda Sarsany, Chief of Planning

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Stark County Regional Planning Commission Stark County Regional Planning Commission

Robert Nau, AICP, Executive Director

Attachments: Stark County, Obia, Proposal for United States Environmental Protection Agency Community-Wide Confition Brownfields Assessment Grant for Petroleum and Hazardons Substances Contaminated Sites

CC: Linda Mangrum, US EPA, Region 5 CC: Kelley Moore, US EPA, Region 5

V.B. Ranking Criteria for Assessment Grants

V.B.1 Community Need

V.B.1.a Targeted Community and Brownfields

V.B.1.a.i Targeted Community Description: Located in northeast Ohio, Stark County is situated in the heartland of Midwest Rust Belt communities; 60 miles south of Cleveland, 24 miles south of Akron, and 54 miles southwest of Youngstown. Prior to the industrialization of our community, Stark County originally gained an economic base as one of the nation's greatest trading centers, transporting agricultural goods and other resources from the Stark region to Lake Erie and Ohio River communities via the Ohio and Erie Canal. Completed in 1832, the canal route lay through Stark County and, as a result, its construction produced twenty-five new villages in the County from 1826-1836. This trading base dominated until the mid to late 1800s, when rail access brought in a large work-force, fueling the growth of the industrial sector and the growth of our community. By the early 1900s, Stark County had become a prosperous industrial community, home to nationally and internationally ranked companies such as Republic Steel (later bought by LTV Steel), which once was the third largest steel producer in the United States; the Hoover Company, the former largest manufacturer of vacuum cleaners in the world; and Hercules Engine, once the world's largest producer of internal combustion engines.

In more recent times, our community has been devastated by bankruptcies, factory closings, and the outsourcing of our industrial base, including the bankruptcy of LTV Steel in 2000, the outsourcing of the Hoover Company, who had been bought out in 2007, and the abandonment of the Hercules Engine building in 1999. Stark County now faces rising unemployment, declining population, increased poverty, decreased tax base, and blight with brownfield properties which once brought economic strength to our region, including the Republic Steel property and Hercules Engine properties, which still remain vacant.

V.B.1.a.ii Demographic Information: Most recent census data indicates a 0.7% population decline from 2000 to 2010, as well as with an unemployment rate above national average. Demographic information for our target community is provided in Table 1:

Table 1: Demographic info for Stark County

	Stark County	State of Ohio	National
Population ¹	375,586	11,536,502	3,087,455,381
Unemployment ²	7.50%	7.40%	7.20%
Poverty Rate	14.5% ¹	15.4% 1	15.1% ³
Percent Minority 1	12.30%	19.30%	26.70%
Median Household Income	\$45,689 ¹	\$48,246 ¹	\$49,445 ³
Median value of owner-occupied house units, 2008-2012 ³	\$124,200	\$133,700	\$181,400

¹2010 U.S. Census data available at http://www.census.gov, ²Bureau of Labor Statistics available at www.bls.gov, ³2008-2012 American Community Survey 5-year estimates available at hppt://factfinder.census.gov

V.B.1.a.iii Brownfields: Through review of the Ohio Brownfield Inventory, the BUSTR database, and Stark County Delinquent Tax List, we have compiled a preliminary Brownfields inventory of at least 229 potential brownfield properties contributing to the deterioration of health, welfare, and the environment in Stark County. Acquisition of grant funds will allow for a complete inventory to be generated. The identified potential brownfield properties are either inactive/vacant or tax delinquent, impeding economic growth and contributing to the perception

of blight in our community. Historic uses for these properties consisted mostly of gas stations, dry cleaners, and industrial/heavy manufacturing sites, with sizes ranging from less than 0.5 acres to over 100 acres. Due to the number of sites identified, site specific information cannot be provided for all potential brownfield properties; however, high profile examples of identified brownfield properties are summarized in Table 2.

Table 2: Examples of Brownfield Properties in Stark County

Site, Location	Size (Acres)	Previous Use	Chemicals of Concern	Health Effects
Former Stewart Brothers Paint, City of Alliance	3.81	Manufacturing - Industrial paints, enamels, varnishes	Asbestos, VOCs, SVOCs PP Metals, Petroleum, PAHs, PCBs	Cancer, CNS, kidneys, liver, respiratory, skin
Former Volcanic Heater, City of Alliance	2.727	Supplier thermal fluid/hot oil heater systems	Asbestos, VOCs, PP Metals, Petrolium, PAHs	Cancer, CNS, kidneys, liver, respiratory, skin
Former Hercules Engine, City of Canton	26	Manufacturing - Engines	Asbestos, VOCs, SVOCs PP Metals, Petroleum, PAHs, PCBs	Cancer, CNS, kidneys, liver, respiratory, skin
Former Republic Steel, City of Massillon	393	Manufacturing - Steel	Asbestos, VOCs, SVOCs PP Metals, Petroleum, PAHs, PCBs	Cancer, CNS, kidneys, liver, respiratory, skin
Molly Stark Hospital, Louisville	34,7017	Tuberculosis sanitarium, alcohol rehab, mental disabilities, drug treatment	Asbestos, VOCs, SVOCs PP Metals, Petroleum, PAHs, PCBs	Cancer, CNS, kidneys, liver, respiratory, skin
Vacant Gas Stations, County-wide	<0.5	Fueling and automotive services	Asbestos, Petroleum, PP Metals, VOCs, PCBs, PAHs	Cancer, CNS, kidneys, liver, respiratory, skin

As demonstrated in Table 2, Chemicals of Concern (COCs) for Brownfields sites can vary, but generally can include asbestos, lead, Volatile Organic Compounds (VOCs), Priority Pollutant (PP) Metals, Petroleum, Polycyclic Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs), and Semi-Volatile Organic Carbons (SVOCs). A major concern regarding unaddressed Brownfield properties in our community is all are suspected or known to contain contamination from these chemicals, which can cause effects to human health including respiratory problems, liver/kidney damage, cancer, toxic and mutagenic effects, development problems, and damage to the skin and to the central nervous system. A large number of the properties on our preliminary inventory are located within our most populated cities of Canton, Massillon, and Alliance, enhancing the probability of human exposure through direct contact, groundwater ingestion, and vapor intrusion. Also clustered within these cities are industrial Brownfield properties which operated before environmental regulations existed, posing an even greater threat for extensive contamination of underlying soil and groundwater.

V.B.1.a.iv Cumulative Environmental Issues: In addition to our brownfield challenges, various cumulative environmental issues contribute to the deterioration of the quality of life in our community. Stark County is the home of five landfills totaling over 800 acres, including the Countywide Landfill, which has been subject to remediation due to a subsurface reaction/fire throughout the late 2000s, as well as numerous odor complaints, and the Uniontown Industrial Landfill, both of which are Superfund sites. In addition, despite significant decline, our community is still largely industrial. US Census American Community Survey Estimates from

2008-2012 indicate that manufacturing is the second largest work sector in Stark County, providing employment for 17.7% of the working population. The US EPA Envirofacts website indicates approximately 66 RCRA hazardous waste handlers are located within a one-mile radius of downtown Canton. Consistently congested areas of traffic also create air quality concerns in our community, particularly due to their locations in populated areas and community gateways. Scorecard.com ranks Stark County in the 90th to 100th percentile of dirtiest/worst counties in the United States for hazardous air pollutants.

V.B.1.b Impacts on Targeted Community: Demonstrated by Table 3, 2010 census data indicates elevated sensitive populations and low income earning individuals live in the vicinity of our example Brownfields compared to County and State data. As a result, the blight resulting from vacant and underutilized properties has greatest effect on the most sensitive populations in our community.

Table 3: Sensitive Populations and Low Income Relative to Stark County Brownfields (2010)

Site. Location	Census Tract	Women of Child Bearing Age (%) ¹	Children under 18 (%) ³	Elderly Age 65 or older (%) ¹	Single female house-holders (%) ¹	African American population (%)		Overall Minority Population (%)	1	Poverty
Former Stewart Brothers Paint, City of Alliance		27.2	28.8	11	26.4	0.3	2	20.6	14.8	32.4
Former Volcanic Heater, City of Alliance	7102	02 21.2	28.8	7.1	20.4	¢.5		20.0	14.0	32.4
Former Hercules Engine, City of Canton	7023	26.7	40.1	6.7	44	56	2.2	65.6	18	66.5
Former Republic Steel, City of Massillon	7141	20.1	25.7	11.8	20	5.4	2.8	9.7	21.3	26.4
	7144	17.1	25.3	15.4	11.4	12.3	3.5	17	17.7	12.3
Molly Stark Hospital, Louisville	7134.02	18.6	22.3	23.5	12.8	3.1	1.2	6.2	14.8	12.6
Stark County	n/a	18.3	22.9	16.2	12.7	7.6	1.6	11.3	13.5	14.5
Ohio	n/a	19.3	23.7	14.1	13.1	12.2	3.1	17.3	13.2	15.4

¹ 2008-2012 American Community Survey 5-year estimates available at hppt://factfinder.census.gov

According to the most relevant available data, the 2010 Stark County Community Indicators Report, significant disparities in health exist between sensitive receptors among Caucasian and African-American populations in our county, which may indicate that the presence of potential environment contamination could be affecting health disparities tabled below in sensitive populations living in Target Areas. Infant mortality rates, pregnant mothers with medical risk factors, and deaths caused by fatal cancers are greater in African American populations in our county than state and national averages

Table 4: Health and Wellness Data by Race – Stark County¹

	Stark Coun	İy	Ohio	USA
Infant Mortality Rate	Caucasian 7.3 ²	African-American 18.9 ²	All Races	All Races 6.94
Received 1st Trimester Prenatal Care	74.90%	57.70%	69.70%	
Pregnant Mothers with Medical Risk Factors	47.80%	55%	45.6%	
Death Caused by Fatal Cancer	175 ³	225 ³	195³	178.4 ^{3,4,5}

¹ Most Recent Data Published in Stark County Health Department 2010 Annual Report, ² Per 1,000 births, ³ Rate per 100,000 individuals, ⁴ U.S. National Center for Health Statistics, ⁵ 2007, --: data not found at national level

Furthermore, age-adjusted incident rates of various types of cancer from 2001-2005 from

The Ohio Department of Health (ODH) indicate that Stark County has higher rates of multiple forms of cancer compared to the overall State of Ohio, including 0.8% higher rates of bladder cancer, 5.5% higher rates of melanoma, 1.1% higher rates of prostate cancer, and 0.5% higher rates of lymphoma. As described in Section V.B.1.a.iii, cancer is a known or suspected health effect of all the potential contaminants from our Brownfields. Though many items can contribute to these elevated risks, there is a potential that environmental contaminants from our Brownfield sites are contributing factors.

Assessment of potential brownfields in Stark County is a vital step in addressing the trends of disproportionate health risks in our community, especially to low income and minority populations who are impacted the most. Once the extent of contamination is evaluated, the properties can be cleaned up and redeveloped into market ready property, mitigating further health impacts and injustices to disadvantaged groups, as well as the community as a whole.

V.B.1.c Financial Need

V.B.1.c.i Economic Conditions: Deindustrialization in Stark County has resulted in vast economic descent, creating many obstacles for our community. Census data indicates that Stark County has lost approximately 12,012 manufacturing jobs in the past ten years alone, down 72% from 42,454 jobs in 2000 to 30,442 in 2010. In addition to unemployment in this sector, removal of our primary employers has resulted in major losses of business for the suppliers, service companies, and other companies that were supported through these factories, extending the plight of deindustrialization to non-industrial sectors throughout the County. Census data indicates that county-wide unemployment has surged a massive 250% from a healthy 2.9% in 2000 to the current rate of 7.5%, above the national average, in addition to a 50% increase in poverty rate, from 9.2 % in 2000 to 14.5% in 2010. The Coalition would like to create market ready real estate available for expanding industries, but economic downturn resulting from industrial decline and plant closures has left our community with limited resources. Without assistance to assess and revitalize brownfield properties, the County will not be able to support the reuse of the large number of brownfields in our community, thus inhibiting the efficiency by which brownfield sites become active, revenue producing properties. Due to budget cuts and restructuring, limited state funding is available for assessment; making it even more difficult to obtain assistance. With a county population of 375,586, our community has not gained the national attention that other rust-belt communities have, such as Detroit and Cleveland. Though we have never received assistance through federal brownfields funds specifically, we have proven programmatic capability by successfully managing other state and federal grants described in Section V.B.5.c. Support from grant funds will be a crucial step in facilitating economic renewal in Stark County and its cities. Stark County is considered an Entitlement Community by the U.S. Department of Housing and Urban Development and our three largest cities, where many of our Brownfield properties are clustered, Canton, Alliance, and Massillon, are all identified as Distressed/Situational Distressed (Canton and Alliance) or Labor Surplus (Massillon) by Ohio Development Services Agency in July – December 2013 reports.

V.B.1.c.ii Economic Effects on Brownfields: The abundance of Brownfields in Stark County has created a great need for more quality employment opportunities. As displayed in Table 3, residents living within close proximity to these vacant and underutilized properties are disproportionally experiencing poverty and unemployment. By removing complications to development caused by brownfields issues, the County plans to attract manufacturing facilities large enough to employ local and regional residents in the neighborhoods where jobs are needed the most. Based on the size of priority sites and the industries that could re-inhabit them, a

minimum of 500 full time permanent jobs could be created when priority sites are redeveloped. In addition, numerous consulting jobs will be created during the project period, as well as environmental cleanup and construction positions added during redevelopment. With our current lack of available employment, skilled workers are leaving the area; according to census data, Stark County experienced a decline in population from 2000-2010, from 378,098 to 375,586 persons.

The second financial concern caused by brownfield properties is the decrease of available revenue used for county and city operations. Based on the Stark County Delinquent Tax List, current unpaid property taxes associated with brownfields is approximately \$650,000. This does not include lost income taxes that could also generate revenue or the cost of municipal services to upkeep these properties. In addition to these costs, the eyesore and environmental stigma associated with abandoned properties serves to reduce property values, directly affecting the residents within their communities. As noted in Table 1, Census 2008-2012 estimates indicate that median value of owner-occupied house units is lower for Stark County than for the rest of the state, and significantly lower than the national average.

V.B.2 Project Description and Feasibility of Success

V.B.2.a Project Description

V.B.2.a.i Project Description: Stark County's Brownfield Initiative began as a result of the County's realization that blight and environmental issues inherent to multiple brownfield properties were inhibiting our goals to improve living conditions, enhance economic competitiveness, support and value our community, and preserve employment opportunities in our community. Blight and environmental issues associated with brownfield properties cause crime, safety and health issues, and impede the availability and development of commercial services such as grocery stores and banks. The presence of brownfield properties also disrupts the redevelopment of industrial properties, preventing the creation of associated jobs. Based on review of state and county agency resources, we have created an inventory of at least 229 potential brownfield sites and are seeking assessment funding to address environmental concerns at multiple priority properties. The expected outputs of the proposed Brownfields initiative include the identification of potential health hazards and environmental risks associated with local Brownfields. Moreover, the Brownfields initiative will directly encourage an increase in market-ready real estate, which will result in job creation and improved economic conditions of the County and surrounding region. At the end of the grant cycle, the Stark County Coalition will continue to update the Brownfields inventory and partner with local private and public entities to continue the Brownfields assessment and redevelopment initiative. Assessment funding would allow the Coalition to continue prioritization planning and hire environmental professionals to conduct assessments at properties where the reuse or redevelopment is inhibited by perceived or confirmed contamination.

The Stark County Coalition's goal for our brownfield initiative is to promote the livability of our communities while reducing environmental threats and improving economic conditions. When prioritizing Brownfields for assessment, preference will be given to eligible sites with locations close to public transit and high populations of disadvantaged groups, also favoring projected end uses most likely to stimulate economic development and job creation.

V.B.2.a.ii Project Management Approach: The Coalition is committed to fulfilling all work plans and reporting obligations under a cooperative agreement with U.S. EPA. The Coalition will diligently measure outcomes from the use of Assessment Grant funds and will track and document the following as achieved during and after the grant project period: acres of land

assessed, acres of property remediated, acres of property redeveloped, redevelopment investment, funds leveraged, jobs created/retained, tax revenue generated, acres of green space preserved and/or created, whether the project will minimize exposure to hazardous substances. The Coalition will comply with all requirements set forth in a cooperative agreement with the U.S. EPA and will utilize tools to assist with regular updates including the EPA's ACRES online database. The Coalition recognizes that the ACRES system is one of the U.S. EPA's tools for tracking success of brownfields grant funding. The Coalition will also submit reports to the U.S. EPA on work status, work progress including difficulties encountered and accounting of financial expenditures, data results, and any changes of key personnel on a quarterly basis.

Following federal procurement procedures in 40 CFR 31.36, the Stark County Regional Planning Commission (SCRPC) will immediately issue and advertise a Request for Qualifications from environmental consultants, evaluate the responses received, and is expected to select qualified consultants, who will perform all work under the contractual category, within 60 days of issuing the Request for Qualifications. Once our Brownfield Inventory is completed and prioritized, site selection and nominations for assessment will begin immediately. Site access is expected to be available within 10 days of site selection.

V.B.2.a.iii Site Selection: The majority of the Brownfields Grant funds will be used for Phase I and Phase II site assessments and remedial planning of potentially contaminated properties. The Coalition's first task will be to collaborate with our committed partners as well as public citizens and stakeholders to expand and complete our Brownfield Inventory. Brownfields will then be prioritized using the following criteria: 1.) Site eligibility; 2.) Site location and projected end-use, emphasizing preference of projects most likely to stimulate economic development and job creation; 3) willingness of property owners to allow access and partner with the Coalition; 4.) Property size and perception of contamination; 5.) Benefits to the community. Sites chosen for assessment will conform to the site specific eligibility requirements set forth by BUSTR and U.S. EPA. Eligibility determinations will be sent to BUSTR and U.S. EPA for review and approval prior to the start of work. It is expected that approximately fifteen (15) priority sites will undergo Phase I and Phase II assessment for each grant type; however, the number of Brownfields assessed using U.S. EPA Brownfields funding may increase or decrease depending on the size and history of the sites chosen for assessment.

V.B.2.b Task Description and Budget Table

V.B.2.b.i Task Description: In order to realize reinvestment in our community and reuse of brownfields properties, the Stark County is requesting an assessment grant in the amount of \$600,000; \$200,000 for petroleum substances and \$400,000 for hazardous substances. Each task is described below, followed by the budget table.

Task 1- Community Outreach: No grant funds will be used for administrative tasks. Following federal procurement procedures in 40 CFR 31.36, we will issue and advertise a Request for Qualifications (RFQ) from environmental consultants, evaluate the responses received, and select one or two consultants to perform all of the work under the contractual category of the grant proposal budget. Our Coalition will submit quarterly progress reports to the U.S. EPA's assigned Project Manager documenting progress and milestones of the Brownfields Initiative. All information will be provided according to the Terms and Conditions of the Cooperative Agreement between the SCRPC and the EPA. Property profile forms and/or information will be completed and entered into the EPA's Assessment, Cleanup and Redevelopment Exchange System (ACRES) online database for each property where grant funds are expended. Financial reports will be completed and submitted to the U.S. EPA. Additionally,

this task includes participation of SCRPC staff at state, regional and national brownfields conferences and/or meetings throughout the project period. For each contaminant type, we are requesting \$2,300 for programmatic costs associated with developing and issuing the RFQ and selecting qualified consultants; \$200 for advertising costs for the RFQ process; \$2,500 for travel costs to attend continuing education events such as the Ohio Brownfield Conference and National Brownfield Conference; and \$3,000 for contractual services to assist the Coalition in project oversight such as preparing financial report updates.

The Coalition proposes to use funding for the community outreach initiatives described in Section V.B.3.a to strengthen partnerships with local neighborhood groups and interested parties. For each contaminant type we are requesting \$2,000 in personnel costs to implement our planned outreach initiatives, including planning and attending meetings, \$500 in supplies to advertise for meetings, and \$4,500 for contractual assistance at public brownfield oversight meetings.

Task 2 – Quality Assurance Project Plan (QAPP)/Brownfield Inventory: As described in Section V.B.1.a.iii, SCRPC has created an inventory of 229 potential brownfield properties in Stark County. Grant funding from the U.S. EPA will increase our capacity to hire qualified consultants to efficiently assist in our efforts to update our inventory. We are requesting a total of \$12,000 in grant funds, \$3,500 for petroleum product properties and \$13,500 for hazardous substance properties, for inventory development, to include a compilation of environmental site information based on environmental database and regulatory agency file review, and for assistance in site prioritization. We are requesting \$10,000 (\$3,000 for petroleum product properties and \$7,000 for hazardous substance properties) for personnel costs to be used to collaborate with contractors and review Brownfields Inventory data for prioritization of sites.

Our Coalition will work with EPA and an environmental consultant to prepare a Quality Assurance Project Plan (QAPP) to be referenced throughout the project period. The QAPP will outline technical project details including management guidelines, quality assurance, documentation and record keeping, methods for field sampling, assessment and oversight of environmental work, and data validation. The cost of the QAPP will be approximately \$3,000 per contaminant type.

Task 3 – Phase I Environmental Site Assessments and Sampling and Analysis Plan and Health and Safety Plan (SAP/HSP): It is anticipated that approximately 20 Phase Is will be completed, approximately 7 for petroleum products and 13 for hazardous substances, and will include projects located within the jurisdictions of all three Coalition members. The assessments will be compliant with ASTM E1527-13 (All Appropriate Inquiry rule) and the Ohio Administrative Code (OAC) 3745-300-06 for the Ohio Voluntary Action Program (VAP). Comprehensive recommendations will be provided for Phase II investigation activities, as applicable. The cost of a typical Ohio VAP Phase I is approximately \$3,500, depending on the complexity and history of the property. A Sampling and Analysis Plan and Health and Safety Plan (SAP/HSP) will be drafted for each site where a Phase II is recommended. We anticipate completing fifteen (15) SAPs/HSPs at a cost of \$2,000 each.

Task 4 – Phase II Environmental Assessments: Phase IIs will be conducted consistent with the requirements of the Ohio VAP, codified OAC 3745-300-07 for hazardous waste sites and the Ohio State Fire Marshall/Bureau of Underground Storage Tank Regulations (SFM/BUSTR) for petroleum sites. Upon completion of the Phase II field sampling activities, the environmental consultant will prepare a report of the Phase II investigation. Results of each Phase II will be used to define the extent of potential environmental impact and will aid in defining redevelopment strategies. We currently anticipate completing fifteen (15) Phase IIs,

eight (8) for hazardous substances and seven (7) for petroleum products. Depending on the property size and the type and extent of contamination, Phase II costs have a wide range; however, costs are expected to be within \$15,000 to \$75,000 per Phase II.

Task 5 – Remedial Action Planning: Remedial Action Plans (RAPs) will be prepared in accordance with Ohio VAP and/or the SFM/BUSTR guidelines to include proposed target clean up levels of chemicals of concern, a description of cleanup options considered, selected cleanup methods, and anticipated costs for implementation. We anticipate completing six (6) RAPS, four (4) for hazardous substances and two (2) for petroleum products, at a cost of approximately \$7,000 each.

V.B.2.b.ii Budget Table: The table below illustrates how Brownfields Assessment Funds will be utilized to support our Brownfields Initiative. The Coalition anticipates the potential for the number of completed reports to change should the cost of any singular investigation vary significantly due to the size, complexity or history of contamination at any given site.

Table 5: Budget Table

D 1 (C)	Task 1: Community	Task 2: QAPP/Site	Task 3: Phase	Task 4: Phase	Task 5: Remedial	55.4.1	
Budget Categories	Outreach	Inventory	I's and SAP's	II's	Planning	Total	
	Hazardo	us Substance Asse	essment Grant	Proposal Budg	ge t		
Personnel	\$4,300	\$7,000				\$11,300	
Travel	\$2,500					\$2,500	
Supplies	\$700					\$700	
Contractual	\$7,500	\$10,000	\$70,000	\$270,000	\$28,000	\$188,500	
Total Request	\$15,000	\$17,000	\$70,000	\$270,000	\$28,000	\$400,000	
	Pe	troleum Assessme	nt Grant Prop	osal Budget			
Personnel	\$4,300	\$3,000				\$7,300	
Travel	\$2,500					\$2,500	
Suppli c s	\$700					\$700	
Contractual	\$7,500	\$5,000	\$33,000	\$130,000	\$14,000	\$189,500	
Total Request	\$15,000	\$8,000	\$33,000	\$130,000	\$14,000	\$200,000	
Grand Total	\$30,000	\$25,000	\$103,000	\$400,000	\$42,000	\$600,000	

V.B.2.c Ability to Leverage: In addition to leveraging the inventory, prioritization and planning work already completed, the Coalition intends to supplement the funds provided through the U.S. EPA grant with additional public and private investment. The County will apply for State of Ohio, JobsOhio grant and loan funds to remediate brownfields sites in conjunction with redevelopment and job creation. The Coalition can access up to 3-million dollars for cleanup of those sites that exhibit an economic beneficial reuse for a site specific cleanup, as needed. Our Coalition may also apply to the Ohio Development Services Agency for technical assistance in Brownfield Action Planning for market analysis, conceptual design, title searches, zoning and policy analysis, beautification projects, startup of community watch organizations and property marketing, when funding becomes available through the state. Upon award of U.S. EPA Brownfields Assessment funding, it is very likely that the JobsOhio and Brownfield Action Planning funds will become available, based on the states willingness to support and leverage federal funding.

The County has participated in the federally funded CDBG program since 1975, and typically receives approximately \$3,000,000/year in CDBG funds. CDBG funds have been used as local match dollars for Stark County's share of the \$4.25 million grant from EPA-HUD-ODOT's Partnership for Sustainable Communities Grant, which was awarded for a 12-county region of Northeast Ohio and incorporates SCRPC staff in leadership roles for planning efforts.

Projects funded with CDBG funds include, but are not limited to: housing rehabilitation, code enforcement, infrastructure improvements, public service initiatives, job training, rental assistance, and sidewalks. The County will continue to value existing neighborhoods where brownfield issues exist.

As described in Section V.B.3.c, the Coalition has developed a partnership with Workforce Initiative Association, a workforce development and training center. Funded through the U.S. Department of Labor, their employment search resources, educational workshops, and employment preparation services are available to the Stark County community free of charge. The County's Brownfield Initiative will provide economic opportunities for individuals throughout all phases of our projects, and working with Workforce Initiative Association will link trained local job seekers to the employment needs of our assessment, remediation, and redevelopment activities.

The County has also demonstrated success in managing the state funded Ohio Public Works Commission and the federally funded Neighborhood Stabilization Program. Projects completed from these programs include improvement of infrastructure and housing rehabilitation, recently facilitating the rehabilitation of 19 vacant and foreclosed units and resale to qualified low- to middle-income households, and the demolition of 16 blighted residential properties. The County generally receives approximately \$15 million dollars/year for infrastructure and traffic upgrades and neighborhood stabilization, which have created the framework for revitalization.

Should a known end user not be available at the time of a remediation, properties can be transferred to the county land bank, the Stark County Land Reutilization Corporation (SCLR), to be marketed for reuse.

V.B.3 Community Engagement and Partnerships

V.B.3.a Plan for Involving Targeted Community and Other Stakeholders and Communicating Project Progress: Due to the vast demographic makeup of people contained within our population of 375,586, community outreach will be achieved through a number of facets to ensure our efforts are well received. Announcements and updates will be made through social media sites where citizens can easily comment and respond to posted information, and information will also be posted to the SCRPC website, which provides staff e-mail addresses for questions and comments. Press releases will be made to the local newspapers and local radio broadcasts such as Mount Union radio station, WRMU, and WHBC, the local Stark County radio station, regarding important project milestones, in addition to being discussed at monthly SCRPC meetings where local citizens and stakeholders are welcomed and encouraged to attend. These media outlets will be used throughout all stages of the Brownfields Assessment projects, including the inception and completion of Phase I and Phase II activities, progressions made during remedial activities, and announcement of No Further Action (NFA) and Covenant Not to Sue (CNS), as well as to announce planning activities such as meetings to update the brownfields inventory. Effectiveness of outreach methods will be evaluated as Brownfield activities develop, and the Coalition will continue our pursuit to engage citizens from all regions and demographics.

In addition to the announcement of Brownfield project milestones, brochures and fact sheets will be developed and distributed to the community through the offices of the SCRPC and The Stockpile, SCRPC's building material reuse warehouse. The public will be encouraged to participate by submitting comments or questions. Communications will be in English, which is the most customary language for Stark County. According to the U.S. Census Bureau, estimates for 2010-2012 indicate that over 96.3% of the population speaks English "very well".

Comments and questions received from the public will be discussed openly in public meetings and made available online. Every effort will be made to answer questions as quickly and directly as possible, with responses provided within ten business days.

The Coalition's plan to involve the community in assessment decisions will also involve the local departments of government such as the health department and economic development department, area business leaders through the local Chambers of Commerce, environmental groups and local residents. SCRPC and our coalition partners have formed strategic partnerships with community organizations, described in Section V.B.3.c, which will enhance the Brownfield Initiative efforts by extending outreach activities through their respective membership and community contacts.

V.B.3.b Partnerships with Government Agencies

V.B.3.b.i Partnerships with Local/State/Tribal Environmental and Health Agencies: The Coalition has developed committed partnerships with both the City of Canton and Stark County Health Departments, who have committed to provide site specific information, as available, and also to attend public meetings and assist with public outreach. Responsible for overseeing the enforcement of public health regulations, these groups will strengthen our Brownfields projects through multiple facets. The Canton and Stark County Health Departments offer valuable information regarding properties that are potentially threatening to human and environmental health, as well as health monitoring data and information on sensitive populations. This input will be of significant assistance during the expansion and prioritization of our Brownfield Inventory and will help to ensure completeness of this task. Furthermore, these agencies also provide public outreach to address health issues and programs to their respective communities, complementing the Coalition's public outreach initiatives by educating the community on the importance of environmental and human health.

Our Coalition has also developed a partnership with Stark County Soil and Water Conservation District (SWCD), who will provide site specific information, as available, as well as a commitment to attend public meetings and assist with public outreach. The Stark SWCD also offers an Urban Program which assists designers and developers in using the most effective best management practices (BMPs) on earthmoving/construction projects, and assists contractors and excavators in implementing these practices throughout all phases of a construction project by following a well-designed storm water pollution prevention plan (SWPPP). These programs will help create sustainable brownfield redevelopments by reducing stormwater pollution in our community.

V.B.3.b.ii Partnerships with Other Relevant Federal, State and Local Governmental Agencies: At the state level, the Stark County Coalition has earned support of the Bureau of Underground Storage Tank Regulations (BUSTR) and the Ohio Environmental Protection Agency (EPA) for its efforts in developing a brownfield assessment, cleanup and revitalization initiative. Communication, collaboration, and support from these agencies will be of upmost importance during the assessment and clean-up of Brownfield properties, as they provide the guidelines which set the standards for remediation and will ultimately determine the success of our projects. These agencies will review all of our work to ensure all endpoints, both to human health and the environment, are addressed, and that compliance is met with all regulations and standards. Once applicable Ohio EPA Voluntary Action Program (VAP) standards and BUSTR regulations are met, requests for No Further Action (NFA) will be sent to the appropriate agency for review and approval. As described in section V.B.2.c, the Coalition will seek leveraging funds from the State of Ohio JobsOhio Funds to remediate brownfields sites in conjunction with

redevelopment and job creation, and will reapply to the Ohio Development Services Agency for technical assistance in Brownfield Action Planning for market analysis, conceptual design, title searches, zoning and policy analysis, beautification projects, startup of community watch organizations and property marketing. These funds will carry our brownfield projects beyond the assessment phases and ensure project completion.

The SCRPC will collaborate and communicate progress on the federal level by submitting quarterly progress reports to the U.S. EPA's assigned Project Manager, documenting progress and milestones of the Brownfields Initiative. All information will be provided according to the Terms and Conditions of the Cooperative Agreement between the Stark County Coalition and EPA. Property profile forms and/or information will be completed and entered into the EPA's Assessment, Cleanup and Redevelopment Exchange System (ACRES) online database. Financial reports will be completed and submitted to the U.S. EPA. Upon completion of remediation activities, we will seek US EPA approval of a Covenant-Not-to-Sue, the highest level of assurance provided at the Federal level that environmental issues have been properly identified and remediated.

V.B.3.c Partnerships with Community-Based Organizations:

Organizations that have committed their support of our Brownfields Initiative are described in the Table 6. Letters from community based organizations have been included in Appendix C.

Table 6: Support from Community Organizations

Organization	Organization Type	Project Role	
D. 33: 1. 4 O	Non-profe Davidson	collaboration, provide site specific research,	
Building Industry Organization	Non-profit Development	community outreach	
	Public Health	collaboration, Brownfield Inventory	
Canton City Health	Public rieatin	development, community outreach	
Stark Development Board, Inc.	Non-profit Economic Development	advocacy, site identification	
C. I. C II. M. D	Dublic Heath	collaboration, provide site specific research,	
Stark County Health Department	Public Health	community outreach, oversight	
Stark County Soil &	Total Carrengert Agency	collaboration, provide site specific research,	
Water Conservation District	Local Government Agency	community outreach, oversight	
Stark Parks	Park District	advocacy, community outreach	
The Stock Pile	Non-Profit Reuse Store	leveraging, public outreach	
Workforce Initiative Association	Workforce Development	collaboration, leveraging, education, outreach	
The University of Mount Union	Educational Institution	collaboration, community outreach/education, provide site specific research	

Throughout grant activities the Stark County Coalition will continue to develop partnerships with community organizations that can leverage the success of our Brownfield projects through increased community education and outreach, collaboration, and by providing resources to expand and prioritize our Brownfields inventory. Using the community outreach tools described in section V.B.3.a, community organizations will be invited and encouraged to attend our public meetings regarding project developments and milestones.

V.B.4 Project Benefits

V.B.4.a Health and/or Welfare and Environment: Two-hundred twenty nine (229) potential brownfield properties have been identified throughout Stark County, all of which are perceived as a tremendous threat to human and environmental health. Assessment of these sites will identify levels of potential contaminants which may be contributing to higher cancer incidences

and elevated health risks in our community, particularly to disadvantaged groups with large populations within close proximity of Brownfield properties. Based upon the results of assessment, the Coalition will prioritize sites for cleanup, which will prevent additional human and environmental exposure, removing health hazards from our community and reversing the trends of injustice to the sensitive populations. Site assessment and remedial planning will be conducted under the Ohio Voluntary Action Program (VAP), which will require the evaluation of exposure pathways to all receptors and will ensure that health risks posed to the community and environment are addressed in a manner consistent with state approved regulatory policy.

By identifying and eliminating contamination at brownfield properties, the Coalition will take care to protect, and not displace local residents, thus creating a more livable neighborhood where efforts to promote equitable housing and transportation are underway. Properties can be revitalized to create needed low income housing and promote needed economic growth, using Stark County's and the cities' CDBG grants, which provide income to develop decent housing and a suitable living environment to people of low-to-moderate income, as leverage. These outcomes coincide with the Livability Principles of providing more transportation choices, promoting equitable affordable housing, increasing economic competitiveness, supporting existing communities, and leveraging federal investment, along with expanding economic opportunities and assisting persons of low-to-moderate income.

V.B.4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

V.B.4.b.i Planning, Policies, Ordinances or Other Tools: Our Coalition believes that with careful planning, Stark County can grow in a method that not only protects and cares for the environment, which is critical to the health and well-being of all residents, but also allows for adequate housing and jobs within the County. Because most brownfields properties are abandoned or underutilized commercial/industrial facilities located in developed areas served by existing infrastructure, the reuse of these sites exemplifies sustainable development. When prioritizing sites for assessment, the County will choose sites where necessary infrastructure already exists or can be upgraded at an affordable cost, thus eliminating the need for additional By incentivizing inclusion of green spaces in the brownfields construction materials. redevelopment, the County will improve air quality and general livability of the community. The County will work to incentivize end users to consider construction and certification of new development using Leadership in Energy & Environmental Design (LEED) practices as described and promoted by the United States Green Building Council. LEED practices include the use of sustainable building materials, recycling of demolition materials, innovative systems for reductions in water and energy use, promotion of walk-able developments and public transportation use, and continued sustainable operation and maintenance of green buildings to ensure responsible, sustainable and healthy use. Using sustainable redevelopment practices throughout the County will ensure that recovered Brownfields sites continue to enrich our community by providing long-term environmentally friendly solutions for needed immediate economic redevelopment.

SCRPC has developed a Sustainable Planning and Zoning Handbook to provide local communities with guiding principles to encourage and direct them in becoming more sustainable, providing information on how to incorporate sustainability into transportation, housing, food production, energy efficiency and conservation, zoning, and development/redevelopments. The SCRPC has incorporated these principles on a county-wide level through the implementation of the following programs:

Transportation: The Stark County Area Transportation Study (SCATS), under the

authority of the SCRPC, manages over \$6,500,000 in funding towards transportation planning and projects within the County to ensure that federally financed transportation activities do not cause new air quality violations, worsen existing violations, or delay timely attainment of the air quality standard, which is currently in a state of nonattainment. Implemented in 2013, the SCATS long-range 2040 Transportation Plan contains transportation projects recommended through the year 2040. In addition to addressing automotive transportation obstacles, the plan also addresses the expansion of public transit and walk and bike trails. SCATS also provides the Traffic Congestion Management Process Report, which identifies areas of congestion and strategies for dealing with the congestion.

Building Material Recycling: In order to address the growing problems of substandard housing and poverty in Stark County, the SCRPC developed The Stock Pile, a non-profit building material reuse warehouse. This agency stores and sells used and overstock building materials to moderate-low income families and non-profit agencies, with items including doors, windows, paints, light fixtures, appliances, bricks, and carpet. In addition to creating employment, the agency has improved homes for over 7,000 families and saved over 1,000 tons of reusable materials from landfills in Stark County and the surrounding area.

V.B.4.b.ii Example of Efforts to Integrate Equitable Development or Livability Principles: Our participation in the federally funded CDBG program will leverage the success of our brownfield redevelopments in addition to integrating equitable development and the six (6) Livability Principles identified in the 2009 Partnership for Sustainable Communities Interagency Collaboration between HUD, DOT and EPA. The CDBG program aims at developing viable communities by providing decent housing and a suitable living environment, along with expanding economic opportunities, for persons of low and moderate incomes. Program activities are required to meet one of the following national objectives: 1.) benefit low-to-moderate income persons, 2.) eliminate slum and blighting conditions, or 3.) address urgent community development needs. With goals which are rooted in the six livability principles, projects funded with CDBG funds include, but are not limited to: housing rehabilitation, code enforcement, infrastructure improvements, public service initiatives, job training, and rental assistance.

V.B.4.c Economic or Non-Economic Benefits

V.B.4.c.i Economic Benefits or Other non-Economic Benefits: Assessment of Brownfields will create market-ready sites at attractive locations while alleviating pressure on clean, uncontaminated and undeveloped green spaces, preventing urban sprawl and protecting the environment. Some of the County's brownfield properties are located adjacent or in close proximity to existing parks and green space. For example, the Former Stewart Brothers Paint site is located approximately 300 feet west of Early Hill Park, and Molly Stark Hospital is located adjacent to undeveloped land to the west, east, and south. By eliminating blight, risk, and crime inherent to brownfield properties, local residents will be more inclined to use and benefit from existing green spaces. The Coalition will encourage and incentivize the inclusion of green space, including urban gardens and rain gardens in brownfield redevelopment planning. Stark County has partnered with several environmental organizations for the benefit of our Brownfield Initiative, including Friends of the Parks who will assist with green space beautification projects at revitalized and underutilized sites. By working to identify, assess, and cleanup brownfields properties, the County will have more land available to develop parks, trails and other green spaces which will support the livability of local neighborhoods.

V.B.4.c.ii Planned Efforts to Promote Local Hiring and Procurement: In order to promote local hiring, the Coalition has partnered with the Workforce Initiative Association, a workforce

development and training center. Workforce Initiative Association's mission is to enhance economic development in Stark County by providing a common point of access to all partner programs and to the desired employment, education and training information and activities for both employers and job seekers. Funded through the U.S. Department of Labor, their employment search resources, educational workshops, and employment preparation services are available to the Stark County community free of charge. The County's Brownfield Initiative will provide economic opportunities for individuals throughout all phases of our projects, and working with the Workforce Initiative Association will link trained local job seekers to the employment needs of our assessment, remediation, and redevelopment activities. Hiring local employees for our projects will leverage the success of our initiatives by directly benefitting residents of our community and retaining skilled employees in Stark County. The Stockpile, SCRPC's non-profit, is in the process of applying for an environmental job training grant through the US EPA to provide workers for these tasks.

V.B.5 Programmatic Capability and Past Performance

V.B.5.a Programmatic Capability: The Coalition will be led by the SCRPC. With a committee consisting of representatives from Stark County offices, as well as Stark County cities, villages, and townships, the group is able to effectively communicate and collaborate on a county-wide basis and incorporate non-urban "micro" communities with populations under 10,000 in our planning initiatives. The mission of the SCRPC is to improve the quality of life in Stark County and its communities through an effective regional forum characterized by communication, collaboration, facilitation and planning assistance. The SCRPC manages and implements a multitude of community improvement programs, including the Community Development Block Grant (CDBG) program; housing rehabilitation and fair housing; long term countywide planning regarding land use in the area of transportation, housing, environmental, economic and community development; and transportation improvement planning; amongst additional outreach and assistance programs. Meetings are held on a monthly basis to discuss program developments, progress, and outreach. The Brownfields Assessment project will be overseen by the following key staff members:

Mr. Robert A. Nau, AICP, Executive Director for the SCRPC, is responsible for the overall direction of the SCRPC, including oversight of comprehensive planning, planning administration, community development, fair housing, subdivision engineering, and geographic information services. Mr. Nau has 24 years of experience in urban planning, including 10 years in his current position, with an expansive background in project administration and compliance.

Ms. Brenda K. Sarsany, Chief of Planning for the SCRPC, will act as Project Manager during the Brownfields Assessment project. She is responsible for crucial programmatic activities for Federal and State grants projects and works with regional city, county, state and federal departments to maintain grant project excellence. Having served the SCRPC for 28 years, her expertise with grant compliance and community outreach will be leveraged to ensure a high level of success for Brownfields initiative outputs and outcomes.

Ms. Rachel Lewis, Senior Regional Planner for the SCRPC, will act as Assistant Project Manager during the Brownfields Assessment project. Ms. Lewis has a M.A. Urban Planning and Geography and eight years of experience in Urban Planning. At the SCRPC, Ms. Lewis develops community action plans and oversees county-wide improvement projects, promoting and incorporating sustainability initiatives to ensure long term success.

In the unlikely event that project leadership changes during the project period, the SCRPC is committed to recruiting and retaining qualified staff members.

The County intends to contract for environmental consulting services to carry out all contractual portions of the project. The contracted environmental consulting firm will be selected in compliance with the Procurement Standards in 40 CFR Part 30 and 31.

V.B.5.b Audit Findings: The SCRPC has had all required audits reviewed and accepted without any adverse findings. SCRPC has also never had problems with the administration of grants.

V.B.5.c Past Performance and Accomplishments

V.B.5.c.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: Though we have never received US EPA Brownfield grant funds, SCRPC has successfully managed millions of grant fund dollars through other federal and non-federal programs. In all of SCRPC's federal and non-federal assistance projects, all work plans, schedules, reporting, and terms were completed in accordance with grant deadlines. Examples projects are provided below.

Energy Efficiency and Conservation Block Grant program: As part of the American Recovery and Reinvestment Act, Stark County administered \$2.7 million from the Department of Energy's (DOE) Energy Efficiency and Conservation Block Grant program. The purpose of this program was to help communities reduce fossil fuel emissions and total energy use, and improve energy efficiency in the building and transportation sectors while creating and/or retaining jobs and stimulating the economy. The majority of the funds went toward energy efficient retrofits for county buildings, including the installation of 4 high efficiency hot water boilers, replacing 2,141 ceiling light fixtures and exit signs with high efficiency fixtures, replacement of windows and doors at two (2) county offices, and updates to the Stark County Courthouse garage ventilation system. In addition, rebate programs were made available for local governments, small business owners, and homeowners for the purchase and installation of qualified energy efficiency upgrades in their public facilities, and 532 rebates at \$25 each were distributed to Stark County residents for the purchase of programmable thermostats.

Community Development Block Grant: The County has participated in the federally funded CDBG program since 1975, and typically receives approximately \$3,000,000/year in CDBG development funds. This program provides funds to develop viable urban communities. Projects financed through this grant in the last three years include housing rehabilitation, code enforcement, public service initiatives, job training, rental assistance, and sidewalks.

HOME Investment Partnership Program: The SCRPC is a participant in the HOME Stark County Consortium in collaboration with the City of Massillon and the City of Alliance. HOME provides formula grants for activities that build, buy and/or rehabilitate affordable housing for rent or homeownership, or to provide direct rental assistance to low-income people. Over \$800,000 were secured for fiscal year 2011, which were used in two housing developments which created a total of 90 units for elderly and low income renters. Funds also were used to bring 24 units up to residential rehabilitation standards, and provide down payment and closing cost assistance to 8 homeowners. The County continues to receive funds on an annual basis.

Ohio Neighborhood Stabilization Program (NSP): The SCRPC, on behalf of the Board of Stark County Commissioners, has participated in the federally-funded NSP since 2009. Receiving over \$6,320,000 from 2009 to 2013, funds have been primarily used for the acquisition, rehab, resale, and demolition of foreclosed and vacant housing units. As outcomes of grant initiatives and expenditures, 19 vacant and foreclosed units have been acquired, rehabilitated and resold to qualified low- to middle-income households, and 16 abandoned units were demolished.

Appendix A - Threshold Criteria

III.C. Threshold Criteria

III.C.1 Applicant Eligibility

All Coalition members are eligible applicants under Section III.A of the FY14 Guidelines. The Stark County Regional Planning Commission is considered a Government Entity Created by State Legislature, and the Cities of Alliance and Canton are considered General Purpose Units of Local Government.

III.C.2 Letters from State Environmental Authorities

Letters of support from the Ohio Environmental Protection Agency and State Fire Marshal/Bureau of Underground Storage Tank Regulations are included as Appendix B.

III.C.3 Community Involvement

Initiatives for involving the community and other local stakeholders in the planning, implementation, and other assessment activities is described in Section V.B.3.a of our Narrative Proposal. Letters of support from local Community-Based Organizations are provided in Appendix C.

III.C.4 Site Eligibility

The Stark County Coalition is seeking a community wide assessment grant, not a site-specific grant; therefore, this section is not applicable at this time. The Coalition proposes, however, that sites to be assessed through the County's Brownfields Initiative be eligible according to III.B of the FY 2014 Guidelines for Brownfields Assessment Grants.

Appendix B - Letters from the State Environmental Authorities: Ohio Environmental Protection Agency and Ohio Bureau of Underground Storage Tank Regulations



John R. Kasich, Governor Mary Taylor, Lt. Governor Craig W. Butler, Interim Director

January 15, 2014

U.S. Environmental Protection Agency, Region 5 Brownfields and Early Action Section ATTN: Linda Mangrum and Kelley Moore 77 West Jackson Blvd. Mail Code SM-7J Chicago, IL 60604-3507

RE: Stark County Regional Planning Commission Coalition: Community-Wide Assessment Grant Proposal

Dear Ms. Mangrum and Ms. Moore:

I am pleased to offer the Ohio Environmental Protection Agency's support for the Stark County Regional Planning Commission Coalition Grant Application. Together with the Cities of Alliance, Canton, and Massillon, the Stark County Planning Commission is applying for a Brownfield Community Wide Coalition Assessment Grant from the United States Environmental Protection Agency in the amount of \$600,000. We have worked with the Stark County Planning Commission in the past and hope to be able to provide our support under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding the Coalition is requesting under their assessment grant proposal will be used to complete Phase I and Phase II assessments of potentially contaminated properties, and to continue building a comprehensive, county-wide brownfield inventory. The need for assessment is greatest in areas most occupied by sensitive populations and low income earning individuals. Though specific sites have not been chosen for environmental assessment, through review of the Ohio Brownfield Inventory and the BUSTR database, the Coalition has compiled a preliminary inventory of over 200 potential brownfield properties throughout Stark County.

We look forward to working with Stark County Regional Planning Commission, Cities of Alliance, Canton, Massillon, and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2285.

Since rely.

Amy Yersávich, Manager

Ohio Environmental Protection Agency

Site Assistance and Brownfield Revitalization

cc: Robert Nau, Executive Director, Stark County Regional Planning Commission Rod Beals, Ohio EPA, DERR/NEDO Nancy Zikmanis, Ohio EPA, DERR/NEDO



Stark County Regional Planning Commission Stark County Area Transportation Study

201 3rd Street NE, Suite 201, Canton, Ohio 44702-1211

Phone: 330-451-7389 Fax: 330-451-7990 Website: www.rpc.co.stark.oh.us

January 8, 2014

Vern Ord, Assistant Chief The Ohio Department of Commerce Division of State Fire Marshal Bureau of Underground Storage Tank Regulations 8895 East Main Street Reynoldsburg, Ohio 43068

Re: <u>Bureau of Underground Storage Tank (BUSTR)</u> State letter of support request, U.S. EPA Brownfield Assessment Grant, FY 2014

Dear Mr. Ord.

Stark County Regional Planning Commission (SCRPC) is requesting a letter of support from the Ohio EPA in order to apply for a U.S. EPA Community-Wide Coalition Assessment Grant to inventory, prioritize, assess, and conduct clean up planning for redevelopment of sites with hazardous substance and/or petroleum related issues within Stark County. The proposed U.S. EPA funds to be used for site assessments will not exceed \$600,000 and will include a \$400,000 grant for hazardous substance site assessment and a \$200,000 grant for petroleum contaminated site assessment. The Coalition will consist of SCRPC (as the lead coalition member), and the Cities' of Alliance, Canton, and Massillon (pending).

The need for Brownfields Assessment in the Stark County community is greatest in areas most occupied by sensitive populations and low income earning individuals. Though specific sites have not been chosen for environmental assessment, through review of the Ohio Brownfield Inventory and the BUSTR database, we have compiled a preliminary Brownfields inventory of over 200 potential brownfield properties throughout Stark County. Large numbers of these brownfields are located within Priority Investment Areas, as our three largest cities, Canton, Alliance, and Massillon, are all identified as Distressed/Situational Distressed (Canton and Alliance) or Labor Surplus (Massillon) by Ohio Development Services Agency in July – December 2013 reports. Blight resulting from vacant and underutilized properties has greatest effect on the most sensitive populations in our community.

The majority of the Brownfields Grant funds will be used for site assessment of potentially contaminated properties. Funding will also be used to continue building a comprehensive, county-wide Brownfields Inventory, and to prioritize those sites for assessment. Sites chosen for assessment will conform to the site specific eligibility

requirements set forth by BUSTR and U.S. EPA. Eligibility determinations will be sent to BUSTR and U.S. EPA for review and approval prior to the start of work. Approximately ten (10) priority sites will undergo Phase II assessment for each grant type. The number of Brownfields assessed using U.S. EPA Brownfields funding may increase or decrease depending on the size and history of the sites chosen for assessment. Community Development Block Grant funds will be leveraged in areas surrounding Brownfields properties in order to ensure a comprehensive strategy to community revitalization. Private investment will be pursued in order to redevelop Brownfields properties. State funding and assistance from the Ohio Department of Development, Jobs Ohio, and Ohio EPA will be pursued for gap financing if cost of assessment exceeds the U.S. EPA Brownfields Grant award, or if funding for remediation is needed.

The expected outputs of the proposed Brownfields initiative include the identification of potential health hazards and environmental risks associated with local Brownfields. Moreover, the Brownfields initiative will directly encourage an increase in market-ready real estate, which will result in job creation and improved economic conditions of the County and surrounding region. At the end of the grant cycle, the Stark County Regional Planning will continue to update the Brownfields inventory and partner with local private and public entities to continue the Brownfields assessment and redevelopment initiative.

In conclusion, on behalf of the citizens of the Stark County, thank you in advance for considering your ongoing support of this project. Please contact this office at (330) 451-7389 if we can provide any additional information to facilitate getting a letter of support in time for the January 22, 2014 deadline.

Sincerely

Robert Nau, AICP

Executive Director

Stark County Regional Planning Commission

Appendix C - Letters of Support from All Community-Based Organizations Identified in the Narrative Proposal



Building Industry Association of Stark County

4344 Metro Circle NW, North Canton, OH 44720 Phone: 330-494-5700 Fax: 330-494-6665 info@biastark.org

Re: The Building Industry Association of Stark County (BIA), Commitment to the Stark County Brownfields Initiative and Pursuit of FY 2014 United States EPA Brownfields Coalition Grant Funds

2014 OFFICERS James Rudo President

> Matt Scheetz Vice President

Todd Michael Secretary/Treasurer

DIRECTORS

Angel Agnes Barbara Bennett Ooug Oentler Michael Grubei Ted Hake Darrell Hostetler Greg Kauth Oave Mathie George Murphy Tom Porter Kathy Rainieri Grea Schalmo Paul Schumacher Kurt Shank Brian Simpson Amanda Smith Robert Soles Javan Yoder

NATIONAL DIRECTORS Kurt Shank Steve Swinehart

LIFE NATIONAL DIRECTORS John Paylis Ooug Prestier

SENIOR LIFE NATIONAL DIRECTORS Fred Tobin

STATE TRUSTEES James Rudo Matt Schools

EXECUTIVE OIRECTOR Joe Race





Dear Mr. Nau,

The Building Industry Association of Stark County is in full support of the Stark County Regional Planning Commission's pursuit of U.S. EPA Brownfields Assessment Funding for the purposes of inventorying and assessing brownfield sites as a method to aid in the revitalization of Stark County.

The RPC's commitment to bringing together local stakeholders with the goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfields Initiative. If awarded, the BIA will offer site specific information as available in order to characterize, prioritize, and conduct Phase I and Phase II Environmental Site Assessments of brownfields throughout the community, and participate in planning meetings to inventory brownfields, and plan outreach to the community regarding brownfields re-development opportunities.

We are a non-profit trade association committed to safe and affordable housing for the residents of Stark County. For over seventy years, we have participated in projects aimed at making redevelopment a priority in the community. Brownfields Assessment, and the conversion of brownfields into useful land, will help create jobs and economic benefit to Stark

Our last project, a housing redevelopment on 10th & 11th Streets Northwest, required us to demolish an abandoned auto repair shop and build houses over it. Many delays occurred because of the time and detail required to make sure the surrounding neighborhood would not be affected by the disturbance. Upon completion, we developed a beautiful new neighborhood that is in great harmony with the surroundings. We speak from experience when we say that Brownfields Assessment is a must in Order to further progress on many economic fronts.

A U.S. EPA Brownfields Assessment Grant will aid in efficiently facilitating the realization our community's goals pertaining to economic development, job creation, sustainable re-development, and the health and welfare of our community. Please contact this office at 330-494-5700 if we can provide any additional information to confirm our support of the Stark County Brownfields Initiative.

Sincerely,

VJoe Race

Executive Director

Building Industry Association of Stark County

CANTON CITY HEALTH DISTRICT

420 MARKET AVENUE NORTH CANTON, OHIO 44702-1544

FHONE: (330) 489-3385 FAX: (330) 489-3335

WEB: WWW CANTONREALTH.ORG



January 9, 2014

Mr. Robert Nau Executive Director Stark County Regional Planning Commission 201 3rd Street, Suite 201 Canton, OH 44702-1211

RE: Canton City Health Department Commitment to the Stark County Brownfields Initiation and Pursuit of FY 2014 United States EPA Brownfields Coalition Grant Funds

Dear Mr. Nau,

The Canton City Health Department is in full support of the Stark County Regional Planning Commission's pursuit of U.S. EPA Brownfields Assessment Funding for the purposes of inventorying and assessing brownfield sties as a method to aid in the revitalization of Stark County.

The Stark County Regional Planning Commission's commitment to bringing together local stakeholders and creating momentum for community outreach and increased efficiency in inventorying local brownfield sites is an indication of the strength of this current Brownfield initiative. If awarded, our agency will offer site specific information as available in order to characterize, prioritize, and conduct Phase I and Phase II environmental site assessments of brownfield sites throughout the community, and participate in planning meetings and other activities relative to brownfield re-development opportunities.

The Canton City Health Department is a local health district responsible for the public health of those that live in work in the Canton community. Among our many duties, our agency is the delegated authority from the Ohio EPA for air pollution control activities in all of Stark County. We also administer the federal asbestos control program for Stark County. We have first hand and detailed knowledge of many of the former industrial sites in Stark County. We will be valuable partners in this project.

Canton, and Stark County, has a proud and strong history as an industrial base in northeast Ohio. Unfortunately over the past several decades there has been a steady shift away from large industrial facilities to other businesses, leaving many sites in our community with potential sites for re-development. Our community would be greatly served by this project as it would allow for the identification, classification, and potential clean up of many of these sites, allowing them to be used for new development.

A U.S. EPA Brownfields Assessment Grant will aid in efficiently facilitation the realization of our community's goals relative to economic development, job creation, sustainable re-development, and the health and welfare of our community. Please feel free to contact me at 330-489-3231 if I can provide any additional information and confirm our support of the Stark County Brownfields Initiative.

Sincerely yours, James M. aclaure, RS, MPH

James M. Adams, RS, MPH

Health Commissioner

Canton City Health District



January 8, 2014

Stark County Regional Planning Commission Stark County Area Transportation Study 201 3rd Street NE STE 201 Canton, OH 44702-1211

RE: Stark Development Board Commitment to the Stark County Brownfields Initiative and Pursuit of FY 2014 United States EPA Brownfields Coalition Grant Funds.

Dear Mr. Nau,

The Stark Development Board is in full support of the Stark County Regional Planning Commission's pursuit of U.S. EPA Brownfields Assessment Funding for the purposes of inventorying and assessing brownfield sites as a method to aid in the revitalization of Stark County.

The RPC's commitment to bringing together local stakeholders with the goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfields initiative. If awarded, the Stark Development Board will offer assistance to the community regarding brownfields redevelopment opportunities.

The Stark Development Board is a private non-profit 501(c)3 economic development organization whose goal is to help retain and attract jobs and capital investment in Stark County, Ohio in the industrial and service sectors. Part of Stark Development Board's initiative is to help Stark County communities evaluate land sites and vacant facilities for future redevelopment, which includes brownfield sites. The Stark Development Board works with real estate developers and environmental consultants to help evaluate the feasibility of brownfield redevelopment.

Stark County has a significant history in manufacturing, and some of these facilities have shut down and remained vacant in part because of possible environmental conditions. The Stark Development Board wants to assist communities in evaluating those vacant properties because of the significant infrastructure and access that is often present near or at the sites and facilities. The Stark Development Board believes important brownfield redevelopment opportunities continue to be available in Stark County.

A U.S. EPA Brownfields Assessment Grant will aid in efficiently facilitating the realization of our community's goals pertaining to economic development, job creation, sustainable redevelopment, and health and welfare of our community. Please contact this office at 330-453-5900 if we can provide any additional information to confirm our support of the Stark County Brownfields Initiative.

Steve Paquette President & CEO

Sincerel

Stark Development Board 116 Cleveland Avenue, N.W., Suite 600 Canton, Ohio 44702-1730 (330) 453-5900 FAX (330) 453-1793 www.starkcoohio.com

Stark County Health Department

Kirkland Norris, RS, MPH, Health Commissioner Philip Francis, President of the Board of Health Maureen Ahmann, DO. Medical Director

JAN 07 2014



January 6, 2014

Mr. Robert Nau
Executive Director
Stark County Regional Planning Commission
201 3rd Street, NE, Suite 201
Canton, Ohio 44702-1211

Re: Stark County Health Department, Commitment to the Stark County Brownfields Initiative and Pursuit of FY 2014 United States EPA Brownfelds Coalition Grant Funds

Dear Mr. Nau.

The Stark County Health Department is in full support of the Stark County Regional Planning Commission's pursuit of U.S. EPA Brownfields Assessment Funding for the purposes of inventorying and assessing brownfield sites as a method to aid in the revitalization of Stark County.

The RPC's commitment to bringing together local stakeholders with goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfields initiative. If awarded, the Stark County Health Department will offer site specific information as available in order to characterize, prioritize, and conduct Phase I and Phase II Environmental Site Assessments of brownfields throughout the community, and participate in planning meetings to inventory brownfields, and plan outreach to the community regarding brownfields redevelopment opportunities.

A community's social, economic, and environmental conditions contribute a great deal to health. While brownfield efforts are largely driven by economic and environmental considerations, there is a strong need for public health involvement. Public health professionals with expertise in environmental health, epidemiology, health data for decision makers, GIS mapping, education, community engagement, and relationship building provide a unique and valued perspective in brownfield efforts.

A U.S. EPA Brownfields Assessment Grant will aid in efficiently facilitating the realization our community's goals pertaining to economic development, job creation, sustainable redevelopment, and the health and welfare of our community. Please contact this office at 330-494-9904 ext. 224 if we can provide any additional information to confirm our support of the Stark County Brownfields Initiative.

Sincerely,

Paul DePasquale, M.P.A., R.S.

Director of Environmental Health

3951 Convenience Circle NW • Canton, Ohio 44718 • Tel 330-493-9904 • Fax 330-493-9920

www.starkhealth.org • Follow Us on Facebook





Soil and Water Conservation District

2650 Richville Dr., S.E., Ste. 103 • Massillon, Ohio 44646 • (330) 830-7700, Ext. 103 • FAX: (330) 830-7731

January 6, 2014

Mr. Bob Nau RPC Director 201 ^{3rd} Street N.E, Suite 201 Canton, Ohio 44702

RE: Stark Soil & Water Conservation District's Commitment to the Stark County Brownfield Initiative and Pursuit of FY 2014 United States EPA Brownfields Coalition Grant Funds.

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Dear Mr. Nau.

The Stark Soil & Water Conservation District strongly supports The Stark County Regional Planning Commissions' pursuit of the U.S EPA Brownfields Assessment Funding for the purposes of inventorying and assessing brownfield sites as a method to aid in the revitalization of Stark County.

The RPC's commitment to bringing together local stakeholders with the goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfields initiative. If awarded, the Stark SWCD will offer specific information as available in order to characterize, prioritize, and conduct Phase 1 & Phase 2 Environmental Site Assessments of Brownfields throughout the community and participate in planning meetings to inventory brownfields and plan outreach to the community regarding brownfields re-development opportunities.

The District is strongly tied to the local community since its inception 60 years ago. We assist landowners in both agriculture and urban through many programs. The District has grown over the years to take a more active role with the development community to ensure conservation practices are on the ground during and after construction projects. We assist the local communities mandated by OEPA to improve water quality through a Storm Water Management Program. The District continues to partner with the Natural Resource Conservation District, OEPA and ODNR Division of Soil & Water to provide conservation programs and opportunities. This grant aligns with the Districts "Mission Statement" to conserve and improve our natural resources.

This U.S. EPA Brownfields Assessment Grant will aid in efficiently facilitating the realization our community's goals pertaining to economic development, job creation, sustainable redevelopment and the health and welfare of our community. Please contact our office at 330-830-7700, 127 if we can provide any additional information to confirm our support of the Stark County Brownfields Initiative.

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Sincerely

Scott Briggs, Board Chairman

Stark Soil & Water Conservation District

Board of Supervisor's



January 3, 2014

Mr. Robert Nau
Executive Director
Stark County Regional Planning Commission
201 3rd Street N.E., Suite 201
Canton, OH 44702-1211

Dear Mr. Nau:

The Stark County Park District is in full support of the Stark County Regional Planning Commission's pursuit of U.S. EPA Brownfields Assessment Funding for the purposes of inventorying and assessing brownfield sites as a method to aid in the revitalization of Stark County.

The RPC's commitment to bringing together local stakeholders is an indication of the strength of this Brownfields initiative. If awarded, the grant will help meet the goal of creating momentum for community outreach and increased efficiency of inventorying local brownfields. Prioritizing and conducting Phase I and Phase II Environmental Site Assessments of brownfields and planned outreach to the community regarding brownfields redevelopment opportunities, will promote economic development in Stark County.

The Stark County Park District has a long history of connecting community resources and promoting the redevelopment of brownfield space into usable open greenspace for the benefit of Stark County residents. Having received funding for both Phase I and Phase II Environmental Site Assessment of property located at Molly Stark Park, we are familiar with the necessity to identify and inventory environmental issues in order to realize our end goal to acquire, preserve, and develop natural areas for passive recreation, conservation, education and nature appreciation. We appreciate Stark County Regional Planning Commission's efforts to inventory and assess brownfield sites in the county. Environmentally impaired sites must be identified and addressed if the county is to become an attractive and healthy site for recreational users and employers seeking healthy communities for their business.

This project has the potential to generate tremendous benefits for the Stark County area, particularly as grant funds aid in redevelopment efforts in order to improve the county's economy and strengthen its neighborhoods. We strongly support the RPC's pursuit of a U.S. EPA Brownfields Assessment Grant and if we can provide any further information, please contact this office at 330.479,2330.

Sincerely.

Robert Fonte

Director



SCRPC Services, Inc.

1387 Clarendon Avenue SW Canton, Ohio 44710

Office: (330) 455-4585 FAX: (330) 455-7060 Website: www.thestockpile.org Email: thestockpile@att.net

Re: The Stock Pile, Commitment to the Stark County Brownfields Initiative and Pursuit of Fiscal Year 2014 United States EPA Brownfields Coalition Grant Funds

Dear Mr. Nau.

The Stock Pile fully supports the Stark County Regional Planning Commission's (RPC) goal of pursuing U.S. EPA Brownfield Assessment Funding for the purposes of inventorying and assessing brownfield sites in Stark County. Ohio to assist in the revitalization of our community.

The Regional Planning Commission's long-term relationships with community businesses and organizations, and RPC's past successes with revitalization programs and federal grants are strong indicators of the RPC's ability to successfully implement this brownfield imitative.

The Stock Pile is a 501-C3 reuse store for building materials, and a project of the RPC. In order to reduce waste and improve substandard housing in Stark County. The Stock Pile solicits donations of reusable building materials from local businesses, contractors, and individuals, Since 1998. The Stock Pile has diverted over 100 tons of waste from landfills and has helped thousands of elderly, disabled, and low-to-moderate income families improve their homes.

The Stock Pile will help with the RPC brownfield initiative by helping educate the public and by leveraging its volunteer partnerships and resources to create beautification projects around brownfields. The Stock Pile is pursing a 2014 EPA Environmental Workforce Development and Job Training Grant to support RPC's brownfield initiative and Stark County's job creation goals.

Stark County has a significant number of properties once used for manufacturing that are currently vacant or under utilized. Also, Stark County has seen an increase in unemployment and poverty levels since the recession in 2007. RPC's implementation of the U.S. Brownfields Assessment Grant will greatly support Stark County's goals and current programs to improve economic development, job creation, and sustainable re-development in Stark County.

Please contact The Stock Pile at (330) 455-4585 if we can provide any additional information in support of the Stark County Brownfield Initiative.

Sincerely.

Painck Gerber

Program Manager - The Stock Pile

Serving Stark and Tuscarawas Counties

January 13, 2014

Mr. Robert Nau Executive Director Stark County Regional Planning Commission 201 3rd Street NE, Suite 101 Canton, OH 44702

Re: <u>The Workforce Initiative Association's</u> Commitment to the Stark County Brownfields Initiative and Pursuit of FY 2014 United States Environmental Protection Agency Brownfields Assessment Grant Funds

Dear Mr. Nau,

For the purposes of efficiently pursuing the goals and objectives of Stark County's Brownfield revitalization and reuse initiative, the Workforce Initiative Association is in full support of the Stark County Coalition's pursuit of U.S. EPA Brownfields Assessment Funding. Please include this letter with your application for FY2014 Brownfields Assessment grant funding.

The Workforce Initiative Association oversees The Employment Source (soon to be named OhioMeansJobs Stark County), northeastern Ohio's premier workforce development and training center that connects job seekers with employers by providing numerous resources in a single location. It is a free service made possible through funds provided by the U.S. Department of Labor and operated locally by the Workforce Investment Board, the Stark and Tuscarawas County Commissioners, and the Mayor of the City of Canton. We view the assessment and redevelopment of Brownfield sites critical in providing opportunities for the attraction of new businesses as well as the expansion and retention of existing businesses that will create more jobs in Stark County for job seekers using our services. We are committed to continuing our participation in attending Brownfield Committee meetings and providing education regarding the Brownfield Initiative to our partner agencies and the community.

Over the past several years, the Workforce Initiative Association (doing business as The Employment Source) partnered with the City of Canton, Stark State College, Goodwill, and Building Healthy Communities to utilize EPA Brownfield Grant funds to provide training to eligible individuals to become skilled certified technicians, prepared for jobs in high-demand environmental remediation occupations. Many from the first class of trainees were hired by companies and assisted with the Gulf Coast oil clean up. As the planning and assessment phases of the Brownfield Initiative move forward,

trained and certified laborers are readily available if remediation or other actions are needed to revitalize Brownfield sites in Stark County.

The County's commitment to bringing together local stakeholders with the goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfield revitalization and reuse initiative. A U.S. EPA Brownfield Assessment Grant will aid in efficiently creating more market ready real estate available for the attraction of new and expanding industries to our area. The assessment of Brownfields in our community will promote environmental protection, health and welfare of our community, economic development, and job creation and retention. The Workforce Initiative Association will continue to participate in the County's Brownfield Initiative to efficiently conduct community outreach, to inventory and prioritize brownfields for assessment and redevelopment, and will continue to train certified laborers that will be readily available for employment assisting in the objectives associated with the Brownfields and Sustainability Initiatives.

In conclusion, please contact this office at (330) 491-2627 if we can provide any additional information to confirm our support of the Stark County Brownfield Initiative.

Sincerely, Junife M. Meck Cells

Jennifer M. Meek Eells

Executive Director

Workforce Initiative Association

JAN 1 4 2014



January 10, 2014

Mr. Robert Nau
Executive Director
Stark County Regional Planning Commission
201 3rd Street NE, Suite 101
Canton, OH 44702

Re: <u>University of Mount Union's</u> Commitment to the Stark County Brownfields Initiative and Pursuit of FY 2014 United States Environmental Protection Agency Brownfields Assessment Grant Funds

Dear Mr. Nau.

For the purposes of efficiently pursuing the goals and objectives of Stark County's Brownfields revitalization and reuse initiative, the University of Mount Union is in full support of the County's pursuit of U.S. EPA Brownfields Assessment Funding.

The County's commitment to bringing together local stakeholders with the goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfield revitalization and reuse initiative. The University of Mount Union will support Stark County's Brownfield Initiative by participating in planning meetings to inventory brownfields, continuing to plan outreach to the local community regarding brownfields assessment and re-development opportunities, and by offering site specific information as available in order to characterize, prioritize and conduct Phase I and Phase II Environmental Site Assessments of blighted brownfields throughout the community.

The University of Mount Union, established in 1846, is a residential campus with enrollment of 2,250 students, and is the second largest employer in the City of Alliance, Stark County, Ohio. As active members of both the College and University President's Climate Commitment and the Association for the Advancement of Sustainability in High Education, Mount Union participates in STARS, a voluntary, self-reporting framework for gauging relative progress toward sustainability for colleges and universities. In an important step toward cooperation, on February 12, 2008, the Mayor of the city of Alliance and I signed an agreement encouraging the city and the University to work together on issues relating to sustainability. This Brownfields Initiative would provide another unique opportunity to work in partnership, as the City of Alliance is a participating member of the Stark County Coalition. Specifically with regard to Brownfields

assessment. Mount Union would be an active participant to committee meetings, provide community education about the importance of the initiative, offer meeting space and faculty input to the matter, and encourage participation on the part of all stakeholders.

The University of Mount Union attracts thousands of visitors to Stark County each year as prospective students and their families arrive to look over our community and our campus. Despite the beauty of our campus and its facilities, our surrounding community's appearance meets with mixed reviews. In an increasingly competitive higher education environment. Mount Union has concerns about how this less than positive impression affects our enrollment. A reduced enrollment translates in to budget reductions, hiring freezes or job losses.

An aerial view of our hometown, City of Alliance, reveals the huge portion of the land base that is currently occupied by vacant industrial areas. While the underused and underutilized portions are primarily located in the northeastern quadrant of the city, there is also a significant amount of space central to the city proper that once held the Babcock and Wilcox research facility. Assessment of these considerable portions of Stark County would enable our community to take the first steps toward developing a comprehensive plan for redevelopment.

A U.S. EPA Brownfields Assessment Grant will aid in efficiently facilitating the realization of our community's goals pertaining to economic development, job creation, sustainable redevelopment and livability, environmental protection, and health and welfare of our community. If awarded, the University of Mount Union will continue to participate in the County's Brownfield Initiative providing support to efficiently conduct community outreach and to identify and prioritize brownfields for assessment and redevelopment. In conclusion, please include this letter in your FY 2014 application for Community-Wide Coalition Brownfield Assessment funding. Please contact this office at (330) 823-6050 if we can provide any additional information to confirm our support of the Stark County Brownfield Initiative.

Sincerely,

Dr. Richard F. Giese

President

University of Mount Union

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Brownfields Assessment Grant Proposal Hazardous Substances and Petroleum Products Stark County, Ohio FY 2014

 ${\bf Appendix}\; {\bf D-Letters}\; {\bf of}\; {\bf Commitment}\; {\bf from}\; {\bf Assessment}\; {\bf Coalition}\; {\bf Members}$



Stark County Regional Planning Commission Stark County Area Transportation Study

201 3rd Street NE, Suite 201, Canton, Ohio 44702-1211

Phone: 330-451-7389 Fax: 330-451-7990 Website: www.rpc.co.stark.oh.us

January 22, 2014

Environmental Management Support. Inc. Attn: Mr. Don West 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910 Phone (301) 589-5318

U.S. Environmental Protection Agency, Region 5 Brownfields and Early Action Section Attn: Linda Mangrum & Kelley Moore 77 West Jackson Blvd. Chicago, IL 60604-3507

RE: Agreement to be part of the Stark County Brownfields Assessment Coalition

Dear Mr. West, Ms. Mangrum & Ms. Moore:

I am writing on behalf of the Stark County Regional Planning Commission (SCRPC) to document our eligibility and agreement to be part of the Stark County Brownfields Coalition. On behalf of the coalition, SCRPC intends to apply to the U.S. EPA for a \$600,000 Community-wide Assessment grant as the Lead Coalition Member. Other coalition partners are the City of Alliance and the City of Canton.

The SCRPC was established in 1957 by virtue of a Resolution of Cooperation by the Board of County Commissioners of Stark County, Ohio, and by the Planning Commissions of some of the municipalities within this county, townships, and other local governments. The SCRPC was vested with the powers given to regional planning commissions under the laws of the State of Ohio, particularly Revised Code 713.21. Such Resolution of Cooperation provided for the creation of a Commission composed of representatives of the cooperating political subdivisions, twelve members from Stark County appointed by the Board of Commissioners of Stark County, and eight other representatives including the Stark County Commissioners and other officials of cooperating local governments. The SCRPC enables the county, townships, cities, villages and other units of government of Stark County to participate in a comprehensive and cooperative regional planning program.

The SCRPC agrees to participate in the Stark County Coalition, and if funding is awarded, to enter into a Memorandum of Agreement (MOA) documenting the coalition's site selection process, the distribution of funds, and the mechanisms for implementing the assessment work. All coalition members are eligible entities for this grant application as the SCRPC is a government entity created by State Legislature and the Cities' of Alliance and Canton are both

general purpose units of local government. All coalition members agree to enter into aforementioned Memorandum of Agreement (MOA) if funding is awarded.

This grant is imperative to the efforts of Stark County to thoroughly identify and address the brownfield sites plaguing our communities, particularly in those areas of Stark County that have either been impacted the most by brownfields and/or have limited resources and staffing to address them effectively. The SCRPC will play a key role in community outreach and act as a liaison between coalition members and the community in identifying and prioritizing sites for assessment and redevelopment.

We look forward to a successful Brownfield Program Coalition. If you need additional information, please contact our office.

Sincerely,

Robert Nau

Executive Director

Stark County Regional Planning Commission



January 7, 2014

Mr. Robert Nau
Executive Director
Stark County Regional Planning
201 3rd St NE, Suite 101
Canton, Oh 44702-1211

Re: City of Canton commitment to the Stark County Brownfields Initiative and Pursuit of FY 2014 United States Environmental Protection Agency Brownfields Coalition Grant Funds.

Dear Mr. Nau:

For the purposes of efficiently pursuing the goals and objectives of Stark County's Brownfield revitalization and reuse initiative, the City of Canton is in full support of the County's pursuit of U.S. EPA Brownfields Assessment Funding and commits to being a member of the Coalition.

The County's commitment to bringing together local stakeholders with the goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfield revitalization and reuse initiative. The City of Canton will continue to participate in planning meetings to inventory brownfields community wide, to plan continued outreach to the local community regarding brownfields assessment and re-development opportunities, and will offer site specific information as available in order to characterize, prioritize, and conduct Phase I and Phase II Environmental Site Assessments of blighted brownfields throughout the community.

The City of Canton has been aggressively working to identify and revitalize Brownfields within municipal boundaries. Currently we are working to conduct Phase II environmental assessments on multiple sites with identified end users and potential to create an excess of 200 jobs. We believe the experience developed and knowledge gained while coordinating and engaging State, Federal and Private agencies will aid the County Wide Initiative to identify and revitalize existing brownfields. It is our intent to participate in planning sessions, encourage revitalization of abandoned locales and lend personnel and resources to the initiative.

In recent years the City of Canton has identified multiple orphaned parcels that when combined have potential to create an industrial facility of 20 plus acres. In similar fashion, working with Private Developers the City has applied for and received funding for Phase II Environmental Assessment of a brownfield location sought after by Utica Shale Development Companies. It is our understanding that brownfield sites because of their industrial history are often in the vicinity of facilities modern industry requires. Arriving companies are asking for sites with increased capacity utilities, and support infrastructure such as Rail Roads and Class A Road access. Revitalized brownfields provide the proximity or access to meet industrial requirements. We recognize that modern industrial requirements are similar to the demands of

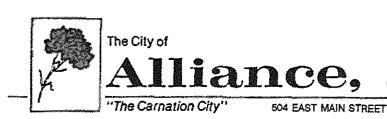
the past and that in the big picture reutilization of brownfields is not only economically efficient it also provides community economic advancement. As a partner in the Stark County Brownfield Revitalization and Reuse Initiative the City of Canton stands ready to share lessons learned, experiences gained and relationships developed to move forward in identifying and reutilizing Industrial brownfields.

A U.S. EPA Brownfield Assessment Grant will aid in efficiently facilitating the realization our community's goals pertaining to economic development, job creation, sustainable re-development and livability, environmental protection, and health and welfare of our community. If awarded, the City of Canton will continue to participate in the County's Brownfield Initiative providing support to efficiently conduct community outreach and to identify and prioritize brownfields for assessment and redevelopment. In conclusion, please contact this office at 330-438-4129 if we can provide any additional information to confirm our support of the Stark County Brownfield Initiative.

Sincerely,

Fonda P. Williams

Director of Compliance



OHIO, 44601-2415

VINCENT A. MARION DIRECTOR

Phone (330) 829-2235 Fax (330) 821-9362

Mr. Robert Nau Executive Director Stark County Regional Planning 201 3rd Street NE, Suite 201 Canton, OH 44702-1211

Re: <u>City of Alliance, Stark and Mahoning Counties, Ohio</u>, Commitment to the Stark County Brownfield's Initiative and Pursuit of FY 2014 United States Environmental Protection Agency Brownfields Coalition Grant Funds

Dear Mr. Nau,

For the purposes of efficiently perusing the goals and objectives of Stark County's Brownfield revitalization and reuse initiative, the City of Alliance is in full support of the County's pursuit of U.S. EPA Brownfield's Assessment Funding and commits to being part of the Coalition.

The County's commitment to bringing together local stakeholders with the goal of creating momentum for community outreach and increased efficiency in inventorying local brownfields is an indication of the strength of this Brownfield revitalization and reuse initiative. The City of Alliance through its Department of Planning and Development will continue to participate in planning meetings to inventory brownfields community wide, to plan continued outreach to the local community regarding brownfields assessment and re-development opportunities, and will offer site specific information as available in order to characterize, prioritize, and conduct Phase I and Phase II Environmental Site Assessments of blighted brownfields throughout the community.

The City of Alliance is located in Stark County in northeast Ohio. The name "Alliance" was chosen in part to reflect the junction of two major railroads. With the presence of accessible rail, Alliance quickly gained an industrial base, with a large work force creating our community. In more recent times, several industrial properties, as well as properties formally containing service sector, retail, mixed use, multi-tenant and single family housing have become inactive, blighted, vacant or underused. Over 35 commercial and industrial Brownfield properties have been identified in our community and over the last several years over 40 housing structures have been demolished, some with abated

asbestos and lead based paint issues, with many more properties yet to be identified and surveyed for contaminants. The City's assessment and revitalization efforts are being guided by our Consolidated Plan and our Sustainability and Climate Action Plan to promote sustainable and equitable development guided by the six (6) Livability Principals identified in the 2009 Partnership for Sustainable Communities Interagency Collaboration between HUD, DOT and EPA.

The Department of Planning and Development will work closely with Stark County Regional Planning and the collaborative partners in achieving the identified objectives of this program. Alliance will participate on the Brownfield Committee, provide site data and sponsor community education programs. Alliance will also involve its community partners such as the Chamber of Commerce, Greater Alliance Development Corporation, Alliance Hospital, University of Mount Union and the various social agencies to assist in site identification and community beatification efforts.

Through our 2010 Consolidated Plan, four (4) contiguous Target Areas were identified for the allocation Community Development Block Grant (CDBG) funds. The Target Areas have specific geographic areas, include portions of census tracks 7102, 7104, and 7105, and are located near the northeast portion of the City, in the vicinity of the intersecting railroads. The City has determined that that these Target Areas are more densely inhabited by sensitive populations such as minorities, children, and women of child bearing age. Of the 35 Brownfield's sites that have been identified, 29 sites are located within the Target Areas. Other Brownfield sites have been identified near residential neighborhoods and in the vicinity of the University of Mount Union, an institution of higher learning with over 2,200 students pursuing undergraduate degrees in our community. Brownfield properties were identified in Alliance through partnerships with the Alliance Health Department, Alliance Area Development, and others, through tools such as the State Fire Marshal/Bureau of Underground Storage Tank Regulations (SFM/BUSTR) environmental databases, as well as visual reconnaissance.

The majority of the City's minority, low income and female headed households are clustered in the Target Areas. According to a the most relevant available data, the 2010 Stark County Community Indicators Report, significant disparities in health exist between sensitive receptors among Caucasian and African-American populations in our county, which, extrapolated to the City level may indicate that the presence of potential environment contamination could be affecting health disparities. Infant mortality rates, pregnant mothers with medical risk factors, and deaths caused by fatal cancers are greater in African American populations in our county than state and national averages.

The Brownfield's Initiative will have a direct effect on improving blood lead levels among residents, especially children as it pertains to lead based paint testing and removal. The City of Alliance Brownfield Initiative concerns all community members. Unidentified sites could be affecting the City's water supply. Alliance's source of water is surface water which the Mahoning River contains potential contaminant sources including Brownfield's within 2 miles of the reservoir (Stewart Brothers Paint Company and UST facilities) and as a result, the surface water supplied to the City of Alliance is

considered to have a high susceptibility to contamination. The revitalization of blighted Brownfield's we will be guided by the City's 2011 Sustainability and Climate Action Plan, developed by the Alliance Green Commission to promote goals of the U.S. Mayors Climate Protection Agreement, which will lead to creating a more equitable environment for our community. In addition to identifying and cleaning up harmful contaminants and promoting land recycling opportunities to use existing infrastructure and prevent urban sprawl, Brownfield's will be reutilized to meet goals for creating green space, parks and recreation areas, as well as to investigate green energy alternatives. The City's Consolidated Plan is strong in the area of housing and community development, and the Sustainability Plan will guide revitalizations toward greener alternatives.

The City of Alliance has identified the creation of capital to invest in the assessment of Brownfield properties as an initial step toward the success of our defined objectives listed in our Consolidated Plan and Sustainability and Climate Action Plan. The City is working to revitalize Brownfield's properties to create market ready real estate for expanding industries investing in job creation for our community. Based on the size of priority sites and the industries that could re-inhabit them, a minimum of 50 full time permanent jobs could be created when priority sites are redeveloped.

Economic disparities at the Target Community are strong indicators that investment in the City of Alliance would create positive effects on the economy of our Target Community, city and region. As discussed in the previous section on Health, Welfare and Environment, 29 of 35 identified potential Brownfield's properties are located in or around Target Areas. The City of Alliance has two financial concerns impacted by Brownfield properties.

The first is the need for more quality employment opportunities. Residents living within Target Areas with the greatest number Brownfield properties are disproportionally experiencing poverty and unemployment. Two of the City's largest industrial sector Brownfield's include Stewart Brothers Paint Company (6.5 acres, and vacant for over 10 years) and Alliance Wholesalers (1.6 acres, which recently burned to the ground), that are located in Target Areas. These properties have amenities such as rail access and are located within 1 mile of major highway State Route 62, which would be attractive to potential new and expanding businesses. By removing complications to development caused by Brownfield's issues, the City plans to attract manufacturing facilities large enough to employ local and regional residents, in the neighborhoods where jobs are needed the most.

The second financial concern caused by Brownfield properties is the decrease of available revenue used for city and county operations. Based on the city wide Brownfield Inventory unpaid property taxes associated with Brownfield's is approximately \$120,000. This does not include lost income taxes that could also generate revenue. The City would like to create market ready real estate available for expanding industries, including those associated with supporting operation of the shale gas boom in eastern Ohio. Without assistance to assess and revitalize Brownfield properties, the City will not be able to

support the reuse of the large number of Brownfield's in our community, thus inhibiting the efficiency by which Brownfield site become active, revenue producing properties. Due to budget cuts and restructuring, limited state funding is available for assessments.

The City of Alliance is considered an Entitlement Community by the U.S. Department of Housing and Urban Development and a Situational Distressed City by the Ohio Department of Development. The City of Alliance has not been previously awarded a U.S. EPA Brownfield's Grant, but has proven programmatic capability by successfully managing other state and federal grants described in Section V.B.2c.

A U.S. EPA Brownfield Assessment Grant will aid in efficiently facilitating the realization of our community's goals pertaining to economic development, job creation, sustainable redevelopment and livability, environmental protection, and health and welfare of our community. If awarded, the City of Alliance will continue to participate in the County's Brownfield Initiative providing support to efficiently conduct community outreach and to identify and prioritize brownfields for assessment and redevelopment. In conclusion, please contact this office at (330)829-2235if we can provide any additional information to confirm our support of the Stark County Brownfield Initiative.

Sincerely,

Alan Andreani, Mayor

City of Alliance

Vincent A. Marion, Director

Unt A Mario

Planning and Development

City of Alliance

Brownfields Assessment Grant Proposal Hazardous Substances and Petroleum Products Stark County, Ohio FY 2014

 ${\bf Appendix} \; {\bf E} - {\bf Other} \; {\bf Considerations}$

Appendix 3 **Other Factors Checklist**

Name of Applicant: Stark County Regional Planning Commission

Please identify (with an X) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page#
	Community population is 10,000 or less	
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing	
L	significant community economic and environmental distress	
X	Project is primarily focusing on Phase II assessments.	8
	Applicant demonstrates firm leveraging commitments for facilitating brownfield	
	project completion by identifying amounts and contributors of funding in the	
	proposal and have included documentation	
	Community experienced manufacturing plant closure(s) (2008 or later) tied to the	
	targeted brownfield sites or project area, including communities experiencing	
	auto plant closures due to bankruptcy or economic disruptions.	
	Recent (2008 or later) significant economic disruption (unrelated to a natural	
	disaster or manufacturing/auto plant closure) has occurred within community,	
	resulting in a significant percentage loss of community jobs and tax base.	
X	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for	8
	Sustainable Communities (PSC) grant that is directly tied to the project area, and	
	can demonstrate that funding from a PSC grant has or will benefit the project	
	area. To be considered, applicant must attach documentation which	
	demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	
	Climate Change (also add to "V.D Other Factors")	

Resolution

Distribution

Journal

File

RPC/R. Nau

Mtark County Commissioners

Stamont There 29, 2011

@phjrct

NE OHIO SUSTAINABLE COMMUNITIES CONSORTIUM MEMBERSHIP AGREEMENT

Commissioner <u>Beanabel</u> moved for the inioption of the following resolution, which was seconded by Commissioner <u>Creighton</u>:

Whereas, in October 2010, a three-year grant of \$4.2 million was awarded by the United States Department of Housing and Urban Development ("HUD") to a consortium of local government and nonprofit organizations in Northeast Ohio through the Northeast Ohio Areawide Coordinating Agency ("NOACA") as formal applicant and fiscal agent; and

Whereas, an Ohio nonprofit corporation known as the Northeast Ohio Sustainable Communities Consortium, Inc., was organized to facilitate regional planning and create a community of practice among planners, governmental officials, nonprofit professionals and other interested citizens dedicated to making the region a better place for all of its citizens to live and work; and

Whereas, the parties intend to offer themselves as a resource to one another in the development and execution of a sustainable communities plan with the conviction that the benefits to be derived from cooperation and collaboration will greatly exceed the individual efforts and resources they will expend individually; and

Whereas, the grant awarded by HUD requires a local match that the consortium members have committed to provide through a variety of in-kind services, facilities and monetary contributions; and

Whereas, it is anticipated that the Stark County Regional Planning Commission will provide its local match through the provision of leadership and in-kind services to the Northeast Ohio Sustainable Communities Planning grant process; and

Whereas, in order to clarify their mutual commitments, the Northeast Ohio Sustainable Communities Consortium Inc. has presented an agreement, which Stark County desires to be a party to.

NOW, THEREFORE, BE IT RESOLVED, that this Board of Commissioners hereby approves and authorizes the President to sign the Agreement, which is incorporated herein and made a part hereof, as though rewritten in full.

Upon roll call the vote resulted as follows:

Dr. Ferguson - 464-

Ms. Creighton - NO

Mr. Bernabei - 400-

CERTIFICATE

I, the undersigned, hereby certify the foregoing to be a true and correct copy of the resolution adopted by the Board.

Markan E. Hanke

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Executive Committee

Chair/NOACA: Grace Gallucci First Vice-Chair/SCATS: Bob Nau Second Vice-Chair/AMATS: Jason Segedy Third Vice-Chair/Eastgate: Rachel McCartney Treasurer/NOACA: Steve Hambley Secretary: Fred Wright

SCATS Region At-large: Jeff Dutton
Eastgate Director: John Getchey
Eastgate Region At-large: Bill D'Avignon (Alternate TBD)
AMATS Region At-large: Gene Nixon (Donna Skoda)
NOACA Region At-large: Freddie Collier (Alternate TBD)
NEFCO: Joe Hadley (Connie Krauss)
FFEF: Brad Whitehead (John Mitterholzer) (Bethia Burke)
RPI: Mike Lyons (Bill Currin)

Executive Committee Materials

The following are materials and information from Executive Committee meetings.

Please feel free to look around and learn more about the Northeast Ohio Sustainable Communities Consortium.

- November 2013
- Executive Committee Packet
- · October 2013 Meeting
- Executive Committee Packet
- September 2013 Meeting
 - Executive Committee Packet
- · August 2013 Meeting
 - Executive Committee Packet
- · July 2013 Meeting
 - Executive Committee Packet
- June 2013 Meeting
 - Executive Committee Packet
- May 2013 Meeting
 - Executive Committee Packet
- April 2013 Meeting
 - Executive Committee Packet
- March 2013 Meeting
 - Executive Committee Packet
- February 2013 Meeting
 - Executive Committee Packet
- December 2012 Meeting

Brownfields Assessment Grant Proposal Hazardous Substances and Petroleum Products Stark County, Ohio FY 2014

Appendix F – Intergovernmental Review

In response to IV.D., the State Intergovernmental Review Office has been notified of the submittal of this application. A complete copy of the proposal will be submitted for Intergovernmental Review on January 22, 2014. The outcome will be provided to the U.S. EPA once the review is complete.



Stark County Regional Planning Commission Stark County Area Transportation Study

201 3rd Street NE, Suite 201, Canton, Ohio 44702-1211

Phone: 330-451-7389 Fax: 330-451-7990 Website: www.rpc.co.stark.oh.us

December 31, 2013

Jeff Dotson State Intergovernmental Review Office 201 3rd St. NE. Suite 201

RE: FY 2014 US EPA BROWNFIELDS ASSESSMENT GRANT

Dear Mr. Dotson:

The Stark County Regional Planning Commission (SCRPC) is in the process of applying for a US EPA community-wide brownfields assessment grant as part of a coalition with the Cities' of Alliance, Canton, and Massillon. The SCRPC will be applying for \$600,000, the maximum available, to develop an inventory of brownfield sites within the county, and also to conduct some Phase I and Phase II Assessments. If awarded, the grant period will be three years, and the SCRPC will serve as the lead member of the coalition. The grant application is currently in the process of being completed, and will be available for your review upon completion. Please inform me if you would prefer to review a digital or hard-copy version of the final grant application. Thank you for your time and consideration. Please feel free to contact me at (330) 451-7390 or ralewis@starkcountyohio.gov should you have any questions or comments.

Sincerely,

Rachel Lewis

Senior Regional Planner